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Before the Federal Communications Commission Washington, D.C. 20554 FCC Docket No. 93-119 General Docket No. 93-40

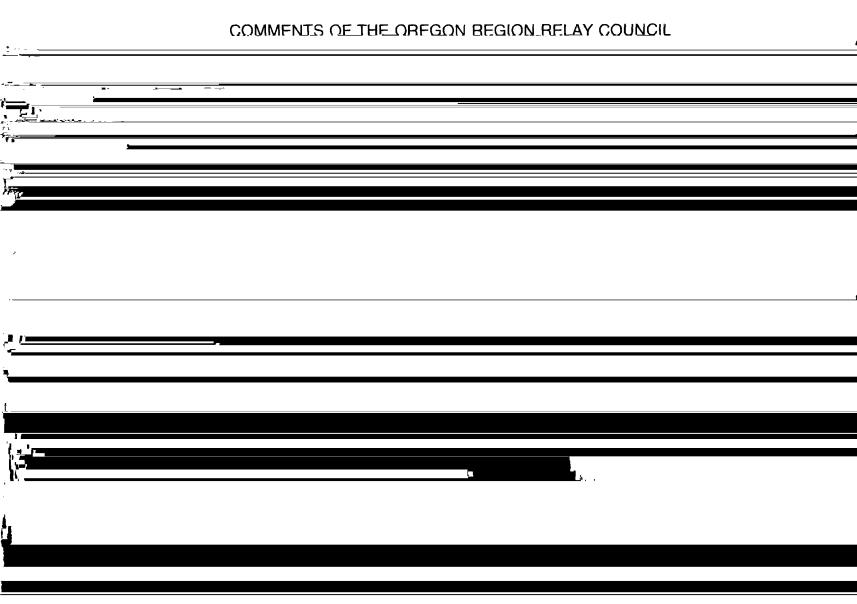
In the Matter of

(FCC Docket No. 93-119)
(General Docket No. 93-40)
(General Docket No. 93-40)
(FEDERAL COMMUNICATIONS OF THE SECRETARY)

(FICE OF THE SECRETARY)

To:

The Federal Communications Commission



4 Point to point requirements provide protection

We note that limiting secondary use by the ARS to coordinated point to point operation will provide significant protection to the Automated Maritime Telecommunications Systems (AMTS). The ORRC supports this requirement as a reasonable means to provide protection to the primary user of the band.

5 Protection of Broadcast TV channel 13

Unlike other services, where the operators are unfamiliar with the technical characteristics of transmission equipment, ARS operators are technically sophisticated. Operators in the

8 Single point of contact

We note that the AMTS has requested a single point of contact which would be responsible for protection of proprietary coordination information possessed by the AMTS service. As coordinators with similar requirements, we understand and concur with the desire to protect confidential information.

Mechanisms to utilize local coordinator resources are in place and functioning

As part of a program to support frequency coordinator participation at a regional level, the ARRL some time ago established an 800 number Bulletin Board System for frequency coordinator use. The system has built in mechanisms to protect frequency coordination information. This existing system is in place, functioning and is able to provide rapid communications between the local frequency coordinators and ARRL. ARS requests for coordination can be processed in an expeditious manner, while providing protection for the primary user of the band. The system will facilitate the utilization of local coordination resources to insure protection of the primary AMTS users of the 219-220 band.

Respectfully submitted,
The Oregon Region Relay Council

